2-17-84

1.1.1

N-15

This DOE memo is in regard to the sewage lagoon at Pasco San. Lfl. and potential for groundwater contam.

Memo: Feb 17, 1984

Upgrade Plans due by May 31, 1984

~~or Closur~~ Construction of new pits or Closure by Nov 1, 1984

States no impacts to G.W seen as result of either sewage lagoon or haz wastes - JUB GW report

State of Washington
Department of Ecology

RRI

This is more for sewage i.e. WQ stds but interesting concerns about effect on buried industrial wastes

RECOMMENDATION FOR ENFORCEMENT ACTION

MEMO TO: Enforcement Officer

DATE: February 17, 1984

FROM: Lawrence N. Peterson
(Full Name of Investigator)

(509) 456-2926
(Public Telephone Number)

RECOMMEND ENFORCEMENT ACTION BE TAKEN AGAINST:

I. Pasco Sanitary Landfill, Inc./Attention: Mr. Larry Dietrich
(Name: Company, Individual, Municipality, County, etc.)
P. O. Box 424 Pasco, WA 99301
(Address) (Zip Code)

II. For:

_____ A. Violation of Water Well Construction Act of 1971, Chapter 18.104 RCW.
_____ 1. Specific paragraph RCW/WAC _____
2. Failure to submit a well report for a well drilled for _____
(Name of Wellowner)
(Address)
(Permit Number)

_____ B. Violation of Clean Air Act, Chapter 70.94 RCW. Specific paragraph RCW/WAC _____

_____ C. Violation of Flood Control Laws, Chapter 86.16 RCW. Specific paragraph RCW/WAC _____

_____ D. Denial of water right application Number _____ (RCW 90.03.290).
Volume of withdrawal or diversion _____
Proposed use _____

_____ E. Violation of Water Resources Laws, Title 90 RCW. (Reference RCW 43.27A)
Specific paragraph RCW/WAC _____

_____ F. Unlawful discharge of wastes into public waters, RCW 90.48.080.

XX G. Water Quality Regulatory Notice and Order, RCW 90.48.120.

_____ H. Noncompliance with waste discharge permit, RCW 90.48.180. (Include a copy of page 1 and the page of the permit containing the condition violated)

_____ I. Intentional or negligent discharge of oil into state waters, RCW 90.48.350.
1. Type of oil (diesel, gasoline, fuel, bunker C, crude, etc.) _____
2. Amount of oil spilled _____ gallons/barrels.

_____ J. Modification of Water Quality Criteria, WAC 173-201-100(2).

_____ K. Other _____

III. The ~~violation~~ situation occurred at: (Time) Ongoing. (Date) _____

IV. Location of the incident/activity: Groundwaters of the state.

V. Name of watercourse involved: N/A Class: N/A

ECY 010-97
Rev. 11/80

Date: February 17, 1984

RECOMMENDATION FOR ENFORCEMENT ACTION

Name of Company or Individual: Pasco Sanitary Landfill, Inc.

VI. Narrative of incident/situation: (Use separate page or memo if necessary)
See attached memo.

VII. Physical evidence obtained: Samples _____ Pictures _____ Other _____

VIII. Names and addresses: _____

IX. Recommended penalty OR regulatory action to be taken: See attached memo.

Enclosures

Lab Report, No. _____
Pictures _____

(Investigated by) L. N. Peterson

Assistant District Supervisor
(Title)

ENDORSEMENT

TO: Regional Manager

FROM: Division Supervisor

We have taken the following actions within the Region to resolve this problem:
See attached memo.

(E. Q. Supervisor) (District Supervisor) (District Engineer)

TO: Enforcement Officer/Assistant Director

FROM: Regional Manager

Recommend enforcement action be taken as proposed.

(Regional Manager) 2/21/84 (Date)

MEMORANDUM

CHECK
INFORMATIO
FOR ACTION
PERMIT ___
OTHER ___

TO: Gail Keyes

FROM: Lawrence Peterson

SUBJECT: ORDER for Pasco Sanitary Landfill, Inc.

DATE: February 17, 1984

State of Washington Department of Ecology

VI.

Pasco Sanitary Landfill, Inc. operates a waste disposal operation that serves the Benton-Franklin area. The landfill serves as the commercial/residential waste disposal site for the Tri-Cities. A lagoon system provides a disposal service for septic tank haulers areawide.

The current lagoon was preceded by an adjacent lagoon (pit) that was abandoned when the bottom and walls became sealed and evaporation was insufficient to provide space for incoming wastewater. During the period 1972 through 1974, the area was a designated industrial waste disposal site. This portion of the property received thousands of tons of waste that would now be designated dangerous and/or extremely hazardous. It was handled in a "state of the art" manner at that time and the site is now classified as closed.

The existing lagoon is the subject of this enforcement request. It has been in operation for approximately five years. As with its predecessor, natural sealing has taken place and an adjacent area was excavated to provide overflow capacity. Utilization of the overflow area was hastened by abnormal volumes received during the construction boom caused by the Washington Public Power Supply System activities at Hanford. Most of the waste received was of chemical toilet origin and was characteristic of raw sewage. This was, in fact, the reason Eastern Regional Office staff became involved in the regulation of the operation. Volumes have receded and the percentage of chemical toilet wastes has lessened in the last two years. However, the facility does continue to overflow during wet periods of the year and the waste contains some untreated sewage.

The pressing problem is that wastewater applied to the primary lagoon is provided settling time and the supernatant carried over to the new pond contains few solids and there is little sealing taking place. The high percolation rate resulting from the overflow is unacceptable. There is some potential for migrating wastewater to influence the closed industrial waste site.

Action to correct this situation was initiated in late 1980. Two problems came to light during subsequent communication with the company and local health officials. First, the company was reluctant to initiate costly construction when a planned hydrogeologic study and associated water quality monitoring program might force early closure of the facility.

RANDUM

CHECK
INFORMATON ___
FOR ACTION ___
PERMIT ___
OTHER ___

TO: Gail Keyes - Page 2

FROM: Lawrence Peterson

SUBJECT: ORDER for Pasco Sanitary Landfill, Inc.

DATE: February 17, 1984

State of Washington Department of Ecology

Second, the closure of the existing facility would cause considerable difficulty to local officials due to the absence of alternate septage disposal sites. A decision was made to allow continued use of this system, with interim operating measures in place to prevent dumping of inappropriate wastes.

The hydrogeologic report and facility analysis indicated that wastewater from the overflow pond was reaching, or could reach, groundwater. The results of an ongoing water quality monitoring program indicated little or no groundwater degradation is occurring. No impact from the industrial waste site or associated influence from the treatment facility has been detected.

It was concluded by this office that continued operation of a sealed, non-overflow lagoon posed no significant threat to groundwater. Pasco Sanitary Landfill was informed that they must submit Plans and Specifications for, and subsequently construct, an approved facility. Following submittal of the final element of a groundwater quality analysis required by this office in 1981, the company requested continued operation without upgrading the facility. This request was based on demonstrated lack of impact on groundwater.

Considerable time and effort has been expended by regional staff in explaining the provisions of RCW 90.48 peratining to this situation. Our position is clear to all concerned. There is a possibility that further effort to solicit voluntary compliance will result in delay and, perhaps, an abrupt closure of the facility. The latter would likely disrupt septic tank pumping services and cause illegal disposal problems.

The Pasco Sanitary Landfill, Inc. wastewater disposal activities do not comply with RCW 90.48.110 ("Plans and Specifications"/WAC 173-240) and RCW 90.48.010 ("Use of all known available and reasonable methods to prevent and control the pollution of waters of the State of Washington.")

IX.

We recommend that an ORDER be issued pursuant to RCW 90.48.120 that requires the following:

MEMORANDUM

CHECK
INFORMATON ___
FOR ACTION ___
PERMIT ___
OTHER ___

TO: Gail Keyes - Page 3

FROM: Lawrence Peterson

SUBJECT: ORDER for Pasco Sanitary Landfill, Inc.

DATE: February 17, 1984

State of Washington Department of Ecology

1. Immediate action that prevents further overflow from the primary lagoon to the overflow pond.

2. Submit for approval to the Eastern Regional Office not later than May 31, 1984, Plans and Specifications for an upgraded treatment facility.

3. Construct a treatment facility according to approved Plans and Specifications or cease all activities and submit a Closure Plan for the existing facility prior to November 1, 1984.

LNP:adw

Eastern Washington Regional Office East 103 Indiana Avenue Spokane, Washington 99207 Telephone (509) 456-2926

J-U-B ENGINEERS, Inc.

N. W. Crossing Office Building, Suite 201
2810 West Clearwater Avenue
Kennewick, Washington 99336
Telephone: (509) 783-2144

June 29, 1984

July 9 sampling results
Well 1 .01 mg/l
2 .03 mg/l
Control <.01 mg/l

Mr. Larry Peterson
Washington State Dept.
of Ecology
E. 103 Indiana
Spokane, WA 99207

Re: Pasco Sanitary Landfill Groundwater Monitoring

Dear Mr. Peterson:

Groundwater monitoring was conducted for the sixth time in March 1984. Three additional parameters were added to the list of species analyzed over previous monitoring efforts. These three additional parameters were sodium, sulfate and total organic carbon. These parameters were measured because they would be additional indicators of potential groundwater contamination. The detailed results of the monitoring effort are provided in Attachment 1 and Attachment 2. Attachment 1 is a set of tables showing all measurements conducted over time at each of the individual monitoring well locations. Attachment 2 is the statistical analysis comparing the concentration of each of the parameters at the control well to concentrations of like parameters at down-gradient wells. The major conclusions relative to the 1984 work are as follows:

Iron is the only parameter present in concentrations in excess of the EPA maximum allowable concentrations. Average iron concentrations at the control well, well #1, #3 and #4 remain above the EPA maximum allowable concentration of 0.3 mg/l. It cannot be concluded that these iron concentrations are from the fill or waste disposal activities since iron concentrations are highest at the up-gradient control well. These concentrations are felt to be reflective of soil conditions in the area.

Iron and total dissolved solids were the only parameters found in significantly different concentrations at the down-gradient wells than at the up-gradient control well. Manganese concentrations were significantly lower at down-gradient wells #3 and #4 than manganese concentrations measured at the

control well. Again, fill activities are not considered to be responsible for any alterations in the manganese concentrations. Fill activities may be responsible for a statistically higher concentration of total dissolved solids at well #4 than at the control well. While the concentration at this location is somewhat elevated the average concentration at well #4 (482 mg/l) is below the EPA allowable maximum concentration of 500 mg/l.

The phenol concentrations measured during this sampling were markedly higher at the control well, #1 and well #2 than had been observed on the five previous surveys. Concentrations at these wells were approximately 0.5 mg/l, while previous readings were all at least an order of magnitude lower. These wells are being resampled and the samples will be reanalyzed. We will inform you of these results.

If you have any questions concerning this information, please call me at 586-6471.

Sincerely,

John A. Zillich
Waste Management and
Environmental Specialist

JAZ:vl

Attachments

cc: Larry Kamberg, Benton-Franklin Health Dept.
Bob Boothe, Franklin County Planner